

EXHIBIT 2

NOTICE OF SUIT

1. TITLE OF LEGAL PROCEEDING; FULL NAME OF COURT; CASE OR DOCKET NUMBER:

UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MINNESOTA

James Keenan, Manuel Vega, Luke Hoffman,
Stephen Hoffman, and Benedict Hoffman,

Case No.: 19-cv-1272 (ECT/ECW)

Plaintiffs,

v.

Holy See (State of Vatican City; The Vatican),

Defendant.

2. NAME OF FOREIGN STATE CONCERNED:

Holy See (State of the Vatican City; The Vatican), by serving:
The Head of the Ministry of Foreign Affairs
Most Rev. Archbishop Paul Richard Gallagher
Secretary of the Section for Relations with States (Foreign Minister)
Apostolic Palace
00120 Vatican City, Europe

3. IDENTITY OF THE PARTIES:

Plaintiff James Keenan is an adult male resident of the State of Minnesota, United States of America. Plaintiff was a minor resident of the State of Minnesota at the time of the sexual abuse alleged in this matter.

Plaintiff Manuel Vega is an adult male resident of the State of California, United States of America. Plaintiff was a minor resident of the State of California at the time of the sexual abuse alleged in this matter.

Plaintiff Luke Hoffman is an adult male resident of the State of Minnesota, United States of America. Plaintiff was a minor resident of the State of Minnesota at the time of the sexual abuse alleged in this matter.

Plaintiff Stephen Hoffman is an adult male resident of the State of Minnesota, United States of America. Plaintiff was a minor resident of the State of Minnesota at the time of the sexual abuse alleged in this matter.

Plaintiff Benedict Hoffman is an adult male resident of the State of Minnesota, United States of America. Plaintiff was a minor resident of the State of Minnesota at the time of the sexual abuse alleged in this matter.

Defendant, Holy See (State of the Vatican City; The Vatican) is, and at all times material hereto was, a foreign state as defined by the terms and provisions of the Foreign Sovereign Immunities Act ("FSIA"), 28 U.S.C. §1603.

JUDICIAL DOCUMENTS

4. NATURE OF THE DOCUMENTS SERVED:

Notice of Suit with attached copy of the U.S. Foreign Sovereign Immunities Act, Amended Summons in a Civil Action, Complaint, and Latin translations thereof.

5. NATURE AND PURPOSE OF THE PROCEEDINGS:

The Plaintiffs' claim against the Holy See (State of the Vatican City; The Vatican) is for damages, injunctive relief, and other relief in an amount to be determined as a result of the Holy See's (State of the Vatican City; The Vatican) nuisance (Common Law and Minn. Stat. §609.74), nuisance (Minn. Stat. §561.01), breach of contract, breach of implied covenant of good faith and fair dealing, deceptive trade practices (M.S.A. §325D.44), false statement in advertisement (M.S.A. §325F.67 & M.S.A. §8.31), intentional infliction of emotional distress, violation of customary international law of human rights, negligence, negligent supervision and negligent retention.

6. NOTICE OF DEFAULT JUDGMENT:

This is not a default judgment. See "8" below.

7. RESPONSE TO SUMMONS:

Holy See (State of the Vatican City; The Vatican) is required to serve upon Plaintiffs' Attorney, Jeffrey R. Anderson, 366 Jackson Street, Suite 100, St. Paul, MN 55101, USA an answer or Rule 12 Motion to the attached complaint, within 60 days after service of the attached documents, exclusive of the day of service. Holy See (State of the Vatican City; The Vatican) must also file the answer or Rule 12 motion with the Clerk of Court, United States District Court for the District of Minnesota. The response may present jurisdictional defenses (including defenses relating to state immunity).

8. FAILURE TO SUBMIT A TIMELY RESPONSE:

The failure to submit a timely response upon Plaintiffs' Attorney, Jeffrey R. Anderson, 366 Jackson Street, Suite 100, St. Paul, MN 55101, USA, and with the Clerk of Court for the United States District Court for the District of Minnesota, may result in the entry of a default judgment and a request for execution to satisfy the judgment. If a default judgment has been entered, a procedure may be available to vacate or open that judgment.

9. UNITED STATES JURISDICTION:

Questions relating to state immunities and to the jurisdiction of United States courts over foreign states are governed by the Foreign Sovereign Immunities Act of 1976, which appears in Sections 1330, 1391(f), 1441(d), and 1602-1611 of Title 28, United States Code (Public Law 94-583; 90 Stat. 2891).

Prepared by APS International, Ltd. in accordance with CFR Ch.1, Sec. 93.2 for:

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